

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**In re:**

**SCUNGIO BORST & ASSOCIATES, LLC,**

**Debtor.**

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**STEPHEN J. SCHERF, SBA PLAN  
TRUST ADMINISTRATOR OF SBA  
PLAN TRUST,**

**Plaintiff,**

**vs.**

**K&D UNGARINI IRON WORK,**

**Defendant.**

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: **Chapter 11**  
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: **Case No. 22-10609 (AMC)**  
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: **Adversary No. 24-00046 (AMC)**  
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**REQUEST FOR ENTRY OF DEFAULT JUDGMENT**

TO THE CLERK:

Pursuant to Fed. R. Bankr. P. 7055 and Fed. R. Civ. P. 55(b)(1), Stephen J. Scherf, the SBA Plan Trust Administrator of the SBA Plan Trust of Scungio Borst & Associates, LLC (the “Plaintiff”), hereby applies for the Entry of Default Judgment in favor of Plaintiff and against

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K&D Ungarini Iron Works LLC (the “Defendant”) in the sum of \$30,850.86 (consisting of \$9,900.00 in avoidable transfers and \$20,600.86<sup>1</sup> in compensatory damages resulting from the August 4, 2023 Sanctions Order, both as pled in the Complaint, plus filing fee costs of \$350.00), and interest accruing at the judgment rate.

Date: August 14, 2024

By: /s/ Edmond M. George  
Edmond M. George, Esquire  
Michael D. Vagnoni, Esquire  
D. Alexander Barnes, Esquire  
OBERMAYER REBMANN MAXWELL & HIPPEL LLP  
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*Counsel to Stephen J. Scherf, the SBA Plan Trust  
Administrator of the SBA Plan Trust of Scungio Borst  
& Associates, LLC*

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<sup>1</sup> Reduced from \$26,600.86 by payments made by Network Flooring (\$3,000.00) and M&D Door & Hardware (\$3,000.00).